

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

Alyssa Portnoy, et al.

Case No. 1:17-CV-00834-MRB

PLAINTIFFS,

JUDGE MICHAEL R. BARRETT

Vs.

**STATEMENT IN SUPPORT OF MOTION  
WITH SUPPORTING MEMORANDUM TO  
COMPEL**

National Credit Systems, Inc. et al

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DEFENDANTS

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Pursuant to Federal Civil Rule 26, Attorney Portnoy hereby provides the Court with a statement that prior to filing Plaintiffs' motion with supporting memorandum to compel, he made reasonable efforts with NCS' attorneys to resolve the disputes concerning NCS providing complete answers to Plaintiffs' first set of written discovery requests to NCS. Opposing counsel and the undersigned were unable to resolve the discovery disputes.

Respectfully submitted,  
s/ Michael D. Portnoy  
Attorney for Plaintiffs